UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: July 19, 2007

SUBJECT: Review of Baseline Conditions Technical Memorandum
Operable Unit 2
Nease Chemical Company

FROM: Dr. Luanne Vanderpool, Geologist
AADS Section

TO: Mary Logan, RPM
Remedial Response Section 2

I have completed my review of the Baseline Conditions Technical Memorandum for Operable Unit 2 at Nease Chemical Company Superfund Site. I have only a couple comments for your consideration.

1. Eastern Overburden Groundwater Assessment, Groundwater Sampling, Section 2.5.5, Page 17 and Section 6.1.2, Page 27, Groundwater Treatment
This section would be improved if a slight amount of detail were provided regarding what was detected in the groundwater. While there is a table in Appendix D with the full results, a summary of the highlights would be helpful. It is stated that "VOC concentrations were somewhat lower than expected". This raises the question of what was expected and what were the levels (e.g. what was the maximum level of selected VOCs) that were found. Mention is made on page 27 that chlorobenzene was not detected and benzene was detected at a relatively low concentration. These observations should have been included in Section 2.5.5.

2. Recommendations: Southern Area Assessment, Section 6.1.1, Page 26
I agree that additional borings and/or temporary monitoring wells are needed to delineate the NAPL found at TW06-21 and TW06-36 (both horizontally and vertically). Will a future workplan define the details and specific objectives of such an investigation?

   It is stated that the proposed remedy of nZVI injections in the Southern Area should be re-evaluated. Given the unanticipated NAPL found in the Southern Area, re-evaluating the remedy in this area is appropriate. The Baseline Conditions Memorandum proceeds to list two modifications to the remedy. It is unclear if the modifications are to evaluated as a stand alone remedy (instead of the nZVI) or if they would also be evaluated in addition to the nZVI. Part of the evaluation of a shallow groundwater trench should include how deep the trench would need to be. Besides continued recovery by pumping will any other NAPL mass reduction alternatives be evaluated?

I hope these comments are of assistance to you. If you have questions or require further help, please call me at 3-9296.

cc. Steve Padovani